



Modern Slavery Statement

Reporting Year 2025

MTR Corporation (Sydney) SMCSW Pty Limited acknowledges the Traditional Owners of the land on which we live and work. We pay our respects to their Elders, past, present and emerging, and recognise their continuing connection to country.

“Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.”

Modern slavery can take many forms including:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- debt bondage;
- forced marriage; and
- the worst forms of child labour (each a form of **Modern Slavery**).

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, although these practices are also harmful and may be present in some situations of modern slavery.¹

¹ Australian Government, Attorney General's Department: <https://modernslaveryregister.gov.au/about/>

Modern Slavery Statement

This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) by MTR Corporation (Sydney) SMCSW Pty Limited (ACN 615 158 122) (**MTR SMCSW**). MTR SMCSW is a “reporting entity” required to provide a modern slavery statement under the Act.

This statement describes the risks of, and actions taken to assess and address the risks of, modern slavery within the operations and supply chains of MTR SMCSW during the 2025 reporting year. It also addresses measures MTR SMCSW implements to monitor the effectiveness of its actions and ongoing improvements.

This modern slavery statement was approved by the Board of MTR Corporation (Sydney) SMCSW Pty Limited in their capacity as the principal governing body of MTR Corporation (Sydney) SMCSW Pty Limited on the 30th of June 2026.

A handwritten signature in blue ink, appearing to be 'Brian Downie', is written over a horizontal line.

(Signed with approval of the Board)

Name: Brian Downie

Position: Director and Chief Executive Officer

Introduction by the CEO

MTR SMCSW recognises the risks of modern slavery and the importance of the Act in introducing measures to tackle the existence of modern slavery in the operations and supply chains of significant businesses in Australia.

MTR SMCSW is committed to taking action in accordance with, and in the spirit of, the Act to identify and eliminate instances of modern slavery in its operations and supply chains.

In doing so, MTR SMCSW is aligned with the commitments of its parent company MTR Corporation Limited.

MTR SMCSW is proud of the steps that it has taken, and continues to take, to identify and remove unacceptable modern slavery practices from its operations and supply chains.

Our business

The MTR group is a world-class operator of sustainable rail transport services. The group's ultimate parent, MTR Corporation Limited, is headquartered in the Hong Kong Special Administrative Region and listed on the Hong Kong Stock Exchange. MTR Corporation Limited's core operations consist of the construction and operation of a mass transit passenger railway network in Hong Kong, with a number of subsidiaries with similar core businesses of constructing and operating rail systems in Mainland China and overseas markets.

MTR group is recognised as a global leader in safe, reliable and sustainable railway transit. With more than 46,000 dedicated staff around the globe, MTR carries over 10 million passengers worldwide every weekday.

MTR SMCSW (a subsidiary within the broader MTR group) is part of a consortium appointed by the NSW Government to deliver the trains, systems, operations and maintenance of Sydney Metro City and Southwest Project (**SMCSW Project**).

Together with Metro Trains Sydney Pty Ltd, MTR SMCSW is one of the two core contractors engaged by NRT CSW Pty Ltd for the delivery of these works. MTR SMCSW is responsible for the delivery of 23 trains, as well as key signalling, central control, communications, and other systems, for the SMCSW Project.

Our structure, operations and supply chains

Structure

MTR SMCSW's ultimate parent company is MTR Corporation Limited, which is based in Hong Kong (MTR SMCSW is fully owned by MTR Corporation (UK) Limited which is fully owned by MTR Corporation Limited).

Operations

MTR SMCSW currently employs around 100 employees, as well as a range of contracted consultants.

The operations of MTR SMCSW are primarily based in Sydney, Australia, with a small number of employees and contractors providing services interstate and in Hong Kong. There are also a number of Hong Kong headquarters-based employees who support the SMCSW Project on both a regular and as-needs basis and a few secondees from Hong Kong headquarters who work on the SMCSW Project in Australia.

The MTR SMCSW workforce comprises engineer and non-engineer employees, including subject matter experts. The substantial majority are specialist rail engineers and other specialists in the project construction space. The workforce also includes a commercial team as well as support in the health, safety, environment and quality (HSEQ) and legal, human resources and IT areas.

The workforce is professional in composition, although the right to freedom of association is conveyed to employees in their induction training and through policies and procedures that govern their employment with MTR.

Recruitment agencies are used relatively infrequently, on an as-needs basis to fill highly specialised roles. These agencies are reputable, mostly based in Australia and are specialised in recruiting professional workers.

There are a small number of individuals who work with MTR SMCSW on a full-time basis and are contracted independently as consultants. These individuals are employed in professional roles.

MTR SMCSW is committed to ensuring its employees and contractors are paid in accordance with all laws and applicable awards, and to acting ethically in its dealings with them.

Supply chains

MTR SMCSW's works on the SMCSW Project include the delivery of highly specialised and sophisticated rail equipment, including trains and other complex systems. The supply chains underpinning these works are complex, and have historically included substantial inputs from around the world, including substantial inputs from entities based in Europe, India and China.

The most substantial suppliers to MTR SMCSW are its four key subcontractors set out below:

- Alstom Transport Australia Pty Limited – supplying the trains and signalling systems;
 - Hitachi Rail GTS Australia Pty Ltd – supplying the central control and communications systems;
 - UGL Engineering Pty Ltd – supplying radio systems; and
 - Gilgen Door Systems AG – supplying platform screen door systems.
- (together the **Significant Contractors**)

MTR SMCSW has a substantial number of other suppliers, primarily local Australian entities supplying other works, systems and services (including consultancy services) in support of delivery of MTR SMCSW's works on the SMCSW Project. This focus on Australian suppliers aligns with commitments made by MTR SMCSW in its contractual arrangements for the SMCSW Project supporting engagement of local industry.

Risks of modern slavery in operations and supply chains

Operations

The majority of the operations of MTR SMCSW are based locally in Australia. Employees of MTR SMCSW are typically professionals engaged via written common law contracts, in which MTR SMCSW has sought to ensure that all legal entitlements are provided for.

MTR SMCSW conducts comprehensive checks on prospective employees throughout the recruitment process where it is considered necessary. The recruitment process consists of use of an online platform, reference checks, relevant visa checks, checking right-to-work status via VEVO (visa entitlement verification online), obtaining all relevant documents prior to the appointment of any employee including relevant passport details, visa documentation and educational transcripts. Furthermore, appropriate induction training is provided to all employees and every employee is provided with the Fair Work Information Sheet upon commencement, advising them, among other things, of our policies and their rights.

As a result, the risk of modern slavery within the operations of MTR SMCSW is considered low.

Supply chains

High-risk categories of services identified are typically engaged in low-skill manual tasks and non-technical or skilled labour hire providers such as service desk providers - often without union representation or enterprise agreements and/or from disadvantaged backgrounds. This is an example of potential for unsafe work practices or exploitation.

High-risk categories for goods, materials and spare parts are goods manufactured or sourced from overseas suppliers and categories where imported or manufactured raw materials or components are used. This is particularly true for suppliers without strong company policies and procedures or who are sourced from high-risk countries as defined by the Global Slavery Index.²

The key supply chain risks of modern slavery identified by MTR SMCSW are in the complex supply chains underpinning the supply of complex specialised rail equipment, which involve multiple supply chain layers underneath the entities directly supplying MTR SMCSW in connection with the SMCSW Project, and which involve suppliers from different parts of the world which are ultimately combined into the end product.

MTR SMCSW's current practice is to gain visibility into our supply chain that we directly engage through our supply chain pre-qualification program as set out in the MTR (Australia) Purchasing & Procurement Procedure, which is reviewed from time to time. This procedure covers both local and overseas sourced supply chain entities. MTR SMCSW notes no relevant procurement was undertaken in reporting year 2025.

For the 2025 reporting year, MTR SMCSW undertook a refresh of its previous specific modern slavery focussed audit program of its supply chain, as discussed in the section 'Our approach - Actions taken by MTR SMCSW to assess and address risks' below.

Through these processes, MTR SMCSW has not identified any risks of modern slavery that we cause, contribute to or have been linked to in the reporting year 2025.

² <https://www.walkfree.org/global-slavery-index/>

Our approach - Actions taken by MTR SMCSW to assess and address risks

As in previous years, we approach our assessment of modern slavery with a risk-based approach and in a systematic manner. This begins at the organisational governance level.

Following a review of our policies and procedures in 2024, we updated and amended our Ethical Sourcing and Modern Slavery policy. This policy is expected to be reviewed again later this year, together with our Whistleblower policy.

As the majority of our key works have now been delivered on the SMCSW project, our modern slavery compliance assurance exercise on key suppliers has focussed on identifying changes that may have occurred to the risks identified in the previous year. Following a review of responses to this process, no changes to identifiable risks were identified. Following further information requested this year, as well as information available on sub-suppliers obtained from the audit and using an online platform to provide information on suppliers and sub-suppliers, no issues or concerns in our supply chains have been identified.

These activities enhance MTR SMCSW's visibility of risks in its supply chain, and ensures that these contractors are aware of MTR SMCSW's expectation that they provide visibility of and manage the risk of modern slavery in their business.

We recognise that given the nature of our sector and supply chain, the risks of modern slavery would most likely be occurring deeper within the supply chain. One of the key focusses of the audits referred to above was identification of key sub-suppliers where modern slavery risks identified on basis of geography and sector. As noted above, information was sought in respect of sub-suppliers where risks were identified, including use of an online platform to obtain information on any adverse media associated with such suppliers and sub-suppliers.

To elevate awareness of the risks of modern slavery in our operations and supply chains and ensure our people are trained appropriately, we provide online training for MTR personnel, including awareness training for the workforce generally and more detailed training for management and those involved in procurement. That training is delivered by e-learn and incorporates understanding assessments for completion and is made available to new personnel on an ongoing basis.

In our Modern Slavery Statement for the reporting year 2024, we detailed our commitment for progressing work in addressing modern slavery risks in our operations and supply chains, which included:

- To continue to review our policies and practices (with a particular focus on supply-chain due-diligence) to ensure they continue to be supportive of our actions to prevent and mitigate instances of modern slavery.
- Continuing our assurance and assessment of supply chain risks adopting a risk based approach having regard to geography, sector, products and services to be delivered in the 2025 reporting year.
- Conducting a risk assessment of identified sub-suppliers having regard to geography, sector, products and services delivered and by checking them against information in an online supplier management platform.

We report the following progress against the aforementioned commitments:

- We continue to monitor changes, and potential changes, to the Act, with a view to identifying and implementing improvements we can make. We have not yet identified a need to update our recently updated Ethical Sourcing and Modern Slavery policy, though a corporate review and update is anticipated this year. Further to previous commitments to improve our approach to due diligence by including diligence on sub-suppliers, we have included an assessment of these suppliers as referred to above in the section 'Our approach - Actions taken by MTR SMCSW to assess and address risks'.
- As part of MTR SMCSW continuous due diligence, a risk-based approach has continued to be applied (see assessment referred to above).
- As described above, MTR SMCSW has included an assessment of identified sub-suppliers in its due diligence.

Our approach – Actions taken by MTR SMCSW to assess the effectiveness of our actions

One of the key activities carried out by MTR SMCSW to effectively track our progress in the key areas outlined in this statement, is to monitor the number of supply chain entities identified as high-risk, which is carried out through our assurance process.

MTR SMCSW began this action in 2021 and are pleased to report that there have been no significant issues or non-compliances identified against modern slavery in the 2025 reporting period.

Consultation with entities owned and controlled

MTR SMCSW does not own or control any other entities.

Looking forward

Our future plans in moving forward with our work in addressing modern slavery risks in our operations and supply chain include, but are not limited to:

- To continue to review our policies and practices, with a review and update expected later this year.
- Continuing our assurance and assessment of supply chain risks adopting a risk based approach having regard to geography, sector, products and services to be delivered in the 2026 reporting year.
- Conducting a risk assessment of identified sub-suppliers having regard to geography, sector, products and services delivered and by checking them against information in an online supplier management platform.

MTR also notes the statutory review of the Act commenced by the Australian government in 2022 and the resulting Review Report released in June 2023, which contained 30 recommendations to strengthen the regime. In November 2024, the government responded to the review and confirmed its intention to consult on a range of recommended reforms, including introduction of civil penalties for non-compliance, more prescriptive reporting requirements, and the introduction of a mandatory due diligence obligation for reporting entities. We will ensure we remain abreast of government and legislative responses to remain compliant with the Act now and in the future and welcome the

important contribution of these developments to enhancing transparency and accountability in addressing and reporting on modern slavery.